



United States Attorney  
Southern District of New York

United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601

April 5, 2022

**BY ECF & EMAIL**

The Honorable Kenneth M. Karas  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**MEMO ENDORSED**

**Re: *United States v. Joel Drezdner, 22 Cr. 148 (KMK)***

Dear Judge Karas:

Per the March 25, 2022, initial conference in this matter, the Government respectfully requests that the following condition be added as a condition of defendants' bail: "The defendant must . . . avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution, including" the individuals identified on Exhibit A attached hereto. The quoted language is from condition 7(g) on the form appearance bond entered for each defendant. See ECF No. 9. As discussed at the March 25, 2022, conference the Government requests that Exhibit A be filed under seal as it identifies third party individuals. In addition, as stated in Exhibit A, the Government does not offer Exhibit A in any way to limit the possible witnesses or victims in this matter. The Government may call additional individuals or categories of witnesses not identified in Exhibit A as witnesses in any trial or hearing in this matter.

Granted.

So Ordered.

4/5/22

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/ Steven J. Kochevar

Steven J. Kochevar  
Assistant United States Attorneys  
Tel: (914) 993-1928

cc: Daniel L. Stein, Esq.  
Michael P. Heffernan, Esq.  
Gedalia Stern, Esq.

# Exhibit A

[Submitted under seal.]